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7 Attorneys for Defendants
 8 WHOLE FOODS MARKET CALIFORNIA, INC. and
 MRS. GOOCH'S NATURAL FOOD MARKETS,
 9 INC.

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA

13 MARY GARRISON and GRACE
 14 GARRISON, individually, and on behalf of all
 others similarly situated,

15 Plaintiffs,

16 v.

17 WHOLE FOODS MARKET CALIFORNIA,
 18 INC., et al.,

19 Defendants.

Case No. 3:14-CV-00334-VC

**STIPULATION AND ~~PROPOSED~~
 ORDER FOR LIMITED
 MODIFICATION TO SCHEDULING
 ORDER**

21 Pursuant to Local Rule 6-1(b), Plaintiffs MARY GARRISON and GRACE GARRISON,
 22 individually, and on behalf of all others similarly situated (collectively "Plaintiffs"), on the one
 23 hand, and Defendants WHOLE FOODS MARKET CALIFORNIA, INC. and MRS. GOOCH'S
 24 NATURAL FOOD MARKETS, INC. (collectively "Defendants"), by and through their
 25 undersigned counsel, hereby stipulate as follows:

26 WHEREAS, on March 18, 2015, the Court ordered that the Parties submit a stipulated
 27 ESI Protocol on or before March 24, 2015 to the extent the Parties were able to reach an
 28 agreement by that time. To the extent the Parties did not reach an agreement by that time, the

1 Court ordered the Parties to provide an update to the Court in their Updated Joint Case
2 Management Conference Statement.

3 WHEREAS, in the Parties Joint Updated Case Management Conference Statement, the
4 Parties indicated that they would be prepared to file a joint letter brief as to their dispute
5 regarding the development of a stipulated ESI Protocol on or before April 3, 2015.

6 WHEREAS, at the March 31, 2015 case management conference, the Parties discussed
7 with the Court their subsequent efforts to confer and agreed to file an ESI Protocol or joint letter
8 brief regarding any outstanding dispute as to the development of an ESI Protocol on or before
9 April 10, 2014.

10 WHEREAS, the Court requested the Parties submit a stipulation documenting the agreed
11 proposal.

12 IT IS THEREFORE STIPULATED that:

13 1. Instead of filing a joint letter brief to the Court on or before April 3, 2015, the
14 Parties shall submit a stipulated ESI Protocol or joint letter brief as to any issues in dispute
15 regarding the development of an ESI Protocol on or before April 10, 2015.

16 2. All other deadlines remain unchanged.

17 IT IS SO STIPULATED.

18 DATED: April 2, 2015

SEYFARTH SHAW LLP

19 By: /s/ Joseph J. Orzano

20 Jay W. Connolly
21 Giovanna A. Ferrari
22 Joseph J. Orzano

23 Attorneys for Defendants
24 WHOLE FOODS MARKET CALIFORNIA,
25 INC. and MRS. GOOCH'S NATURAL FOOD
26 MARKETS, INC.
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DATED: April 2, 2015

SCOTT COLE & ASSOCIATES, APC

By: /s/ Molly A. Desario

Matthew R. Bainer
Molly a. DeSario

Attorneys for Plaintiffs
MARY GARRISON and GRACE
GARRISON, individually and on behalf of all
other similarly situated

PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

1. Instead of filing a joint letter brief to the Court on or before April 3, 2015, the Parties shall submit a stipulated ESI Protocol or joint letter brief as to any issues in dispute regarding the development of an ESI Protocol on or before April 10, 2015.

2. All other deadlines remain unchanged.

DATED: April 6, 2015



HON. VINCE CHHABRIA
United States District Court Judge

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